

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	No.1:19-CR-10081-IT-2
)	
DONNA HEINEL)	
)	
_____)	

**MOTION FOR LEAVE TO FILE UNDER SEAL A MOTION
TO QUASH TRIAL SUBPOENA**

Subpoenaed non-parties Ronald Orr, Scott Jacobson, Steve Lopes, and Katie Fuller seek leave to file under seal their motion to quash the trial subpoenas issued to them by defendant Donna Heinel. As grounds therefor, Ms. Fuller and Messrs. Orr, Johnson, and Lopes state that their motions and accompanying exhibits contain sensitive, confidential, and personally identifiable information. Accordingly, under Local Rule 7.2, Ms. Fuller and Messrs. Orr, Johnson, and Lopes respectfully request that the Court grant them leave to file under seal: (a) their Motion to Quash Trial Subpoena, and (b) the exhibits thereto.

RONALD ORR, SCOTT JACOBSON,
STEVE LOPES, AND KATIE FULLER

By their attorneys,

/s/ Payal Salsburg
Payal Salsburg, BBO# 568812
Mark D. Smith, BBO# 542676
Laredo & Smith, LLP
101 Federal St., Suite 650
Boston, MA 02110
617.443.1100
salsburg@laredosmith.com
smith@laredosmith.com

Dated: November 3, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this date this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to those indicated as non-registered participants.

/s/ Payal Salsburg
Payal Salsburg